# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, FRIENDSHIP-WEST BAPTIST CHURCH, THE ANTI-DEFAMATION LEAGUE AUSTIN, SOUTHWEST, AND TEXOMA REGIONS, SOUTHWEST VOTER REGISTRATION EDUCATION PROJECT, TEXAS IMPACT, MEXICAN AMERICAN BAR ASSOCIATION OF TEXAS, TEXAS HISPANICS ORGANIZED FOR POLITICAL EDUCATION, JOLT ACTION, WILLIAM C. VELASQUEZ INSTITUTE, FIEL HOUSTON INC., ISABEL LONGORIA, and JAMES LEWIN,

Case No. 5:21-cy-844-FB

#### Plaintiffs.

## - against -

GREGORY W. ABBOTT, in his official capacity as Governor of Texas, JOSE A. ESPARZA, in his official capacity as Deputy Secretary of State of Texas, WARREN K. PAXTON, in his official capacity as Attorney General of Texas, and LUPE C. TORRES, in her official capacity as Medina County Elections Administrator,

Defendants.

### MOTION FOR ADMISSION PRO HAC VICE OF ANDREW B. GARBER

## TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Andrew B. Garber, applicant herein, and moves this Court to grant admission to the United States District Court for the Western District of Texas *pro hac vice* to represent Plaintiffs Friendship-West Baptist Church, the Anti-Defamation League Austin, Southwest, and Texoma Regions, Texas Impact, James Lewin, and Isabel Longoria in this case, and would respectfully show the Court as follows:

1. I am an attorney and a member of the law firm Brennan Center for Justice at NYU School of Law with offices at:

120 Broadway, Suite 1750

New York, NY 10271

Telephone: (646) 292-8358

Facsimile: (212) 463-7308

2. Since 2019, I have been and presently am a member of and in good standing

with the Bar of the State of New York. My New York bar license number is 5684147.

3. I have been admitted to practice before the following courts:

U.S. District Court for the Southern District of New York Admitted: July 16, 2019

U.S. District Court for the Eastern District of New York Admitted: August 1, 2019

4. I am presently a member in good standing of the bars of the courts listed above.

5. I have not previously applied to appear *pro hac vice* in this District Court.

I have never been subject to grievance proceedings or involuntary removal 6.

proceedings while a member of the bar of any state or federal court.

7. I have not been charged, arrested, or convicted of a criminal offense or offenses.

8. I have read and am familiar with the Local Rules of the Western District of Texas

and will comply with the standards of practice set out therein.

9. I will file an Application for Admission to Practice before the United States

District Court for the Western District of Texas, if so requested; or I have co-counsel in this case

who is admitted to practice before the U.S. District Court for the Western District of Texas:

Sean Morales-Doyle

120 Broadway, Suite 1750

New York, NY 10271

Telephone: (646) 292-8363

Should the Court grant applicant's motion, I shall tender the amount of \$100.00 pro hac

vice fee in compliance with Local Court Rule AT-l(f)(2), made payable to: Clerk, U.S. District

Court.

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Wherefore, I pray that this Court enter an order permitting the admission of Andrew B.

Garber to the Western District of Texas *pro hac vice* for this case only.

Respectfully submitted,

Andrew B. Garber N.Y. Bar No. 5684147

BRENNAN CENTER FOR JUSTICE AT

NYU SCHOOL OF LAW 120 Broadway, Suite 1750 New York, NY 10271

Telephone: (646) 292-8358 Facsimile: (212) 463-7308 andrew.garber@nyu.edu

#### CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the <u>\$\mathbb{S}\simes\$</u> day of September, 2021.